IN THE DRAWINGS:

The attached Replacement Sheet of drawings includes changes to Fig. 2F. This Replacement Sheet, which includes Fig. 2D, Fig. 2E, and Fig. 2F, replaces the original sheet including Fig. 2D, Fig. 2E, and Fig. 2F. In amended Fig. 2F, the word "Bold" has been removed from the link-back node 218. Support for this change may be found in the specification at, for example, page 13, lines 14-24.

Attachments: Replacement Sheet
Annotated Sheet showing changes

## REMARKS

The present application has been reviewed in light of the Office Action dated February 10, 2005. Claims 1, 3-9, 11-17, and 19-24 are presented for examination, of which Claims 1, 9, and 17 are in independent form. Claims 1, 3, 4, 9, 11, 12, 17, 19, and 20 have been amended to define Applicant's invention more clearly. Favorable reconsideration is requested.

An Information Disclosure Statement (IDS) and a corresponding PTO-1449 form were filed on March 3, 2003 ("the first IDS"). Attached to the Office Action is an initialed copy of the PTO-1449 form from a second IDS filed on April 8, 2004, but to date no initialed copy of the PTO-1449 form from the first IDS has been received. Applicant respectfully requests the Examiner to return an initialed copy of the PTO-1449 form from the first IDS.

The specification has been amended for clarification purposes and to make it consistent with the drawings. Applicant respectfully submits that the changes to the specification add no new matter to the original disclosure.

Submitted herewith is a Replacement Sheet of drawings, which includes changes to Fig. 2F. In amended Fig. 2F, the word "Bold" has been removed from the link-back node 218. Applicant submits that the changes to the drawings add no new matter to the original disclosure, and support for the changes may be found in the specification at, for example, page 13, lines 14-24. Approval of the corrected drawings is respectfully requested.

The Office Action states that Claims 1, 4-7, 9, 12-15, 17, and 20-23 are rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,558,431

(Lynch et al.) in view of the article "22 Balanced Search Trees" (Fourman); that Claims 3, 11, and 19 are rejected under § 103(a) as being unpatentable over Lynch et al. in view of U.S. Patent No. 6,035,326 (Miles et al.); and that Claims 8, 16, and 24 are rejected under § 103(a) as being unpatentable over Lynch. Applicant submits that independent Claims 1, 9, and 17, together with the claims dependent therefrom, are patentably distinct from the cited prior art for at least the following reasons.

An aspect of the present invention, as set forth in the independent claims, is directed to restructuring an input HTML document to comply with strict HTML. The input HTML document is linearly traversed to create a hierarchical tree structure representation, which is converted into an output HTML document. The traversal maintains a current insertion point for elements within the tree structure representation and, during the traversal, elements of the input HTML document that violate strict HTML are identified.

For each identified element, the structure representation is retraced from the current insertion point to identify a further insertion point from which the identified element can depend. The retracing includes noting each parent element of the identified element passed during the retracing. Additionally, for each identified element, the identified element is appended at the further insertion point, and new elements are created in the tree structure representation corresponding to the parent elements passed during the retracing. The new elements are created in reverse chronological order to that encountered during the retracing. Further, for each identified element, each new element is appended to the identified element as a corresponding link back element to the corresponding parent element encountered during the retracing.

Lynch et al. relates to an editor that enables an HTML source document to be visually edited while preserving the structure and the formal of the HTML source document. In the Office Action, it is asserted that Lynch et al. "implicitly discloses" the claimed appending step, and points to Fig. 3 and column 2, lines 21- 24, of Lynch et al. in support thereof ("The editor would not have placed the bold tags from the parent node position of the paragraph nodes, and instead create new bold nodes as child nodes of the paragraph nodes 303.").

However, as is apparent from the clarifying amendments to the specification and to the independent claims, the invention of independent Claims 1, 9, and 17 does not operate to create a new (bold) node but rather to *create a link-back element*, which links back to a parent element encountered during a retracing operation on an element identified to violate strict HTML.

It follows therefore that Lynch et al. fails to disclose or suggest all the features claimed in independent Claims 1, 9, and 17. In fact, the arrangement disclosed in Lynch et al. is believed to be in contrast with the invention of Claims 1, 9, and 17, because the Lynch et al. arrangement creates a new node by *copying an erroneous node*.

It is respectfully submitted that Fourman fails to remedy the deficiencies of Lynch et al. The Office Action cites Fourman as disclosing an arrangement for appending a child node to its first parent node. However, Fourman is not understood to teach or suggest creating a link-back element, which links back to a parent element encountered during a retracing operation on an element identified to violate strict HTML, as claimed in the independent claims.

Therefore, Applicant submits that independent Claims 1, 9, and 17 are patentable over Lynch et al. and Fourman, considered individually or in any permissible combination. Accordingly, withdrawal of the rejections under 35 U.S.C. § 103(a) is respectfully requested.

The other rejected claims in this application depend from one or another of independent Claims 1, 9, and 17, and therefore are submitted to be patentable for at least the reasons discussed above. However, because each dependent claim also is deemed to define an additional aspect of the invention, individual reconsideration of the patentability of each claim on its own merits is respectfully requested.

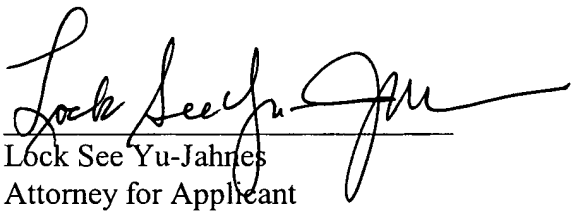
This Amendment After Final Action is believed clearly to place the present application in condition for allowance and, therefore, its entry is believed proper under 37 C.F.R. § 1.116. Accordingly, entry of this Amendment, as an earnest effort to advance prosecution and reduce the number of issues, is respectfully requested. Should the Examiner believe that issues remain outstanding, it is respectfully requested that the Examiner contact Applicant's undersigned attorney in an effort to resolve such issues and advance the case to issue.

In view of the foregoing amendments and remarks, Applicant respectfully requests favorable reconsideration and allowance of the present application.

## CONCLUSION

Applicant's undersigned attorney may be reached in our New York Office by telephone at (212) 218-2100. All correspondence should continue to be directed to our address listed below.

Respectfully submitted,



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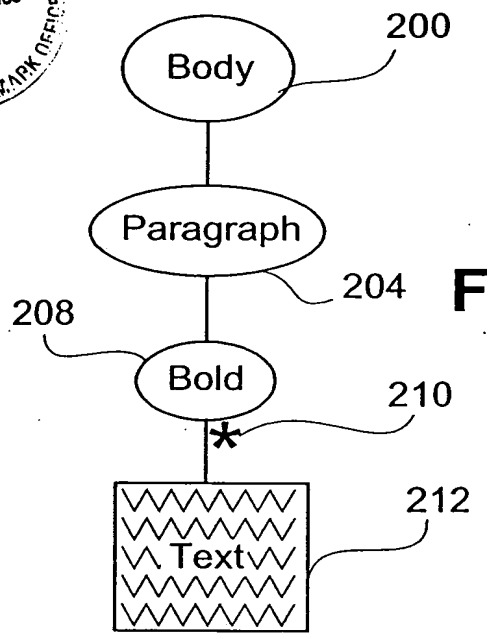


Fig. 2D

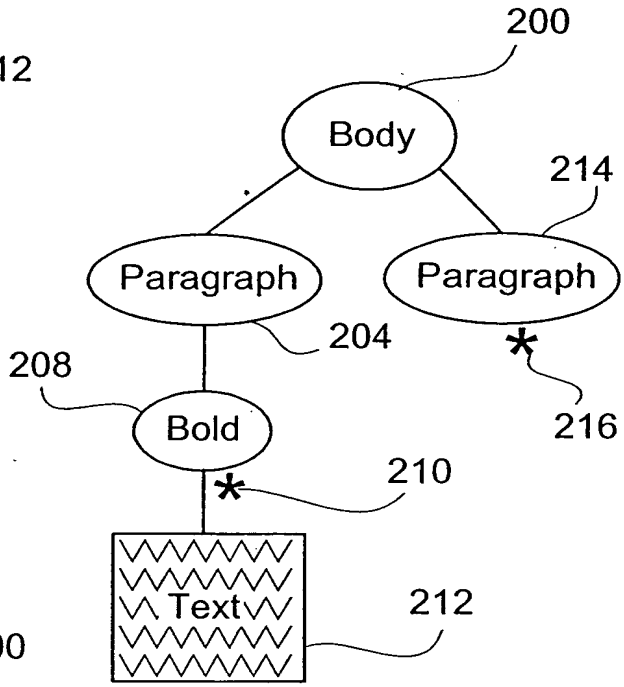


Fig. 2E

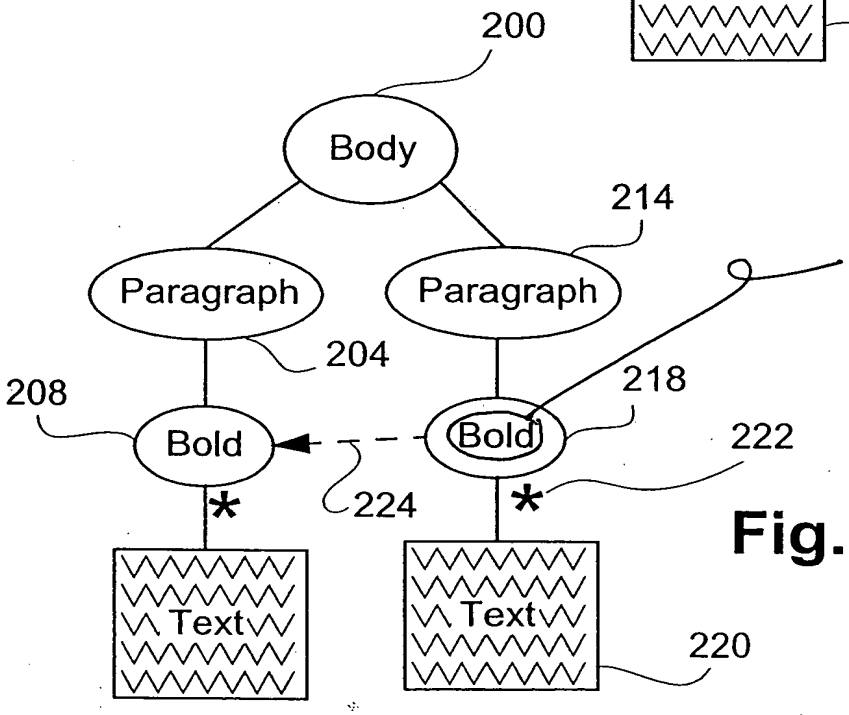


Fig. 2F